



October 9, 2007

Stephen D. Coan
State Fire Marshall
The Commonwealth of Massachusetts
Department of Fire Services
PO Box 1025 – State Road
Stow, MA 01775

Thomas G. Gatzunis
Commissioner of Public Safety
The Commonwealth of Massachusetts
Department of Fire Services
PO Box 1025 – State Road
Stow, MA 01775

Re: Meeting to discuss recent research into smoke alarm performance and smoke characterization study.

Gentlemen:

This letter is in response to your letter dated September 17, 2007 requesting participation in a joint meeting of the Board of Fire Prevention Regulations (BFPR) and the Board of Building Regulations and Standards (BBRS) on October 11. The National Electrical Manufacturers Association appreciates the invitation to comment on the State of Massachusetts examination of smoke detector technologies and fire safety.

NEMA is the trade association of choice for the electrical manufacturing industry. Founded in 1926 and headquartered near Washington, D.C., its approximately 450 member companies manufacture products used in the generation, transmission and distribution, control, and end-use of electricity. These products are used in utility, medical imaging, industrial, commercial, institutional, and residential applications. Domestic production of electrical products sold worldwide exceeds \$120 billion. In addition to its headquarters in Rosslyn, Virginia, NEMA also has offices in Beijing, São Paulo, and Mexico City.

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Our members make smoke alarms and detectors using a wide variety of technologies. We do not seek to argue in favor of, or in opposition to, any particular technology, but we strongly object to banning any specific technology and would urge the state to reject any proposals to do so.

NEMA urges Massachusetts not to take any action to favor or disfavor any technology that has been shown to meet standards adopted by nationally recognized life safety standard setting bodies. It is beyond dispute that all approved (or listed) technologies save lives, performing to standards set by experts in a recognized, peer-reviewed process after full consideration of all material aspects of a given technology product class.

In 2004, NIST, the National Institute of Standards and Technology, a government agency, completed a study of residential smoke alarms. They concluded: "Smoke alarms of either the ionization type or the photoelectric type consistently provided time for occupants to escape." The most significant difference from earlier NIST studies was that escape time was shorter, due in part to "faster fire development times for today's products that provide the main fuel sources for fires, such as upholstered furniture and mattresses." Massachusetts leadership in passing fire safe cigarette legislation is an important step in responding to the threat posed by these new materials.

Massachusetts has a history of leadership in fire safety. When it comes to this complex issue, we hope you agree that a consensus of the experts has great value. And in the case of life safety, one consensus is clear: A working smoke alarm is the best, first defense.

Respectfully,



Evan R. Gaddis
President/CEO

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